

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEANNETTE FULLER HAUSLER as)
<i>Successor Personal Representative</i>)
<i>of the Estate of ROBERT OTIS FULLER,</i>)
<i>("BOBBY FULLER"), Deceased, on behalf</i>)
<i>of THOMAS CASKEY as Personal</i>)
<i>Representative of the Estate of LYNITA</i>)
<i>FULLER CASKEY, surviving daughter</i>)
<i>of ROBERT OTIS FULLER, The</i>)
<i>ESTATE OF ROBERT OTIS FULLER,</i>)
<i>FREDERICK FULLER, FRANCIS</i>)
<i>FULLER, GRACE LUTES, JEANNETTE</i>)
<i>FULLER HAUSLER, and IRENE MOSS,</i>)
Petitioner,)
- against -)
JP MORGAN CHASE BANK, N.A.,)
CITIBANK, N.A., UBS AG, THE ROYAL)
BANK OF SCOTLAND N.V.)
(FORMERLY KNOWN AS ABN AMRO,)
N.V.), BANK OF AMERICA, N.A., and)
NATIONAL BANK OF CANADA,)
Garnishee-Respondents.)
)
JPMORGAN CHASE BANK, N.A.,)
CITIBANK, N.A., UBS AG, THE ROYAL BANK)
OF SCOTLAND N.V. (FORMERLY KNOWN AS)
ABN AMRO BANK N.V.), and BANK OF)
AMERICA, NATIONAL ASSOCIATION,)
Garnishee-Respondent)
and Third-Party Petitioner,)
- against -)
BANCO FINANCIERO INTERNACIONAL S.A.,)
BANCO INTERNACIONAL DE COMERCIO,)
S.A., BANCO NACIONAL DE CUBA, BANCO)
POPULAR DE AHORRO, ABBOTT)

09 Civ. 10289 (VM)

(Related to the JPMChase/Citibank Turnover Proceeding -- Tranche I)

**NOTICE OF MOTION FOR
JUDGMENT ON PLEADINGS
CONCERNING CITIBANK'S
INTERPLEADER PETITION
AND FOR TURNOVER ORDER**

RE: Fidel Castro Ruz, Raul Castro Ruz, The Republic of Cuba, and The Cuban Revolutionary Armed Forces

[JUDGMENT DEBTORS])

LABORATORIES, INC., as successor to Quimica)
 Knoll de Mexico, S.A. de C.V., AEROFLOT)
 LINEAS AEREAS SOVIETICAS, ALBET)
 INGENIERA Y SISTEMAS, BANCO BILBAO)
 VIZCAYA ARGENTINA, S.A., BANCO)
 BILBAO VIZCAYA ARGENTINA PANAMA,)
 S.A., as successor to Banco Exterior Panama, S.A.,)
 BANCO DE CREDITO DEL PERU, as successor)
 to Financiera Nacional S.A., BANCO DE)
 ESPANA, BANCO ESPANOL DE CREDITO,)
 BANCO MONEX S.A., BANCO NACIONAL)
 DE MEXICO, S.A., BANCO PAULISTA S.A.,)
 BNP PARIBAS, BNP PARIBAS ESPANA, S.A.,)
 BANCO SANTANDER S.A., BANCO)
 SANTANDER TOTTA, S.A., as successor to)
 Banco Totta & Acores S.A., CAJA DE AHORROS)
 Y MONTE DE PIEDAD DE MADRID, CASA DE)
 CAMBIO MONEX, S.A., CREDIT SUISSE)
 GROUP AG, as successor to Swiss American)
 Securities, DRESDNER LATEINAMERIKA A.G.,)
 as successor to Dresdner Bank Lateinamerika A.G.,)
 ESTUDIOS MERCADOS Y SUMINISTROS S.L.,)
 GREEN DOWA HOLLAND BV, HSBC)
 TRINKAUS & BURKHARDT AG, ING BANK)
 N.V., INSTITUTO DE CARDIOLOGIA Y)
 CIRUGIA CARDIOVASCULAR CUBA,)
 INTERNATIONAL HANDLERS, INC., JSC)
 ZARUBEZHTSVETMET, LTU)
 LUFTTRANSPORT-UNTERNEHMEN GMBH,)
 NOVAFIN FINANCIERE S.A., PETROLEOS DE)
 VENEZUELA S.A., PHILIPS MEXICANA S.A.)
 DE C.V., PREMUDA S.P.A., SANPAOLO)
 BANK S.A., SELECMAR SHIP MANAGEMENT,)
 TUI UK LTD., as successor to Britannia Airways)
 Ltd., TRYG FORSIKRING, as successor to)
 Baltica Bank and Baltica Forsikring, UNION)
 BANCAIRE PRIVEE, VITOL ENERGY)
 (BERMUDA) LTD and JEANNETTE FULLER)
 HAUSLER as Successor Personal Representative)
 of the Estate of ROBERT OTIS FULLER)
 ("BOBBY FULLER"), Deceased, on behalf of)
 THOMAS CASKEY as Personal Representative)
 of the Estate of LYNITA FULLER CASKEY,)
 surviving daughter of ROBERT OTIS FULLER,)
 THE ESTATE OF ROBERT OTIS FULLER,)
 FREDERICK FULLER, FRANCIS FULLER,)

GRACE LUTES, JEANNETTE FULLER)
HAUSLER, and IRENE MOSS,)
)
Adverse Claimants-)
Respondents.)
)

PLEASE TAKE NOTICE that upon the Turnover Petition dated April 21, 2010, the annexed Declaration of James W. Perkins dated April 15, 2011, the exhibits annexed thereto, the accompanying Memorandum of Law in Support, and upon all other papers and prior proceedings had herein, Petitioner Jeannette Hausler will move this Court before the Honorable Victor Marrero, at the United States Courthouse located at 500 Pearl Street, Courtroom 20B, New York, NY 10007-1312, at a date and time to be determined by the Court, for a judgment in her favor: (1) pursuant to Fed. R. Civ. P. 12(c) on the pleadings filed in connection with Citibank, N.A.'s Joint Third-Party Petition Alleging Claims in the Nature of Interpleader dated April 21, 2010; (2) granting turnover pursuant to Fed. Rules Civ. P. 56 and 69 and CPLR 5225(b) and (c) of the funds in the blocked accounts that are the subject of this proceeding; and (3) for such other and further relief as the Court deems to be appropriate and just.

Dated: New York, New York
April 15, 2011

GREENBERG TRAURIG, LLP

By: 
James W. Perkins (JWP 6684)
Bryn Haffey (BH 0510)
Attorneys for Petitioner
200 Park Avenue, 38th Floor
New York, New York 10166
Phone: (212) 801-3188
Fax: (212) 801-6400

GREENBERG TRAURIG, LLP

David A. Baron
2101 L Street, N.W.,
Suite 1000
Washington DC 20037
Phone: (202) 331-3100
Fax: (202) 331-3101

COLSON HICKS EIDSON

Roberto Martinez
Ronald W. Kleinman
255 Aragon Avenue
Second Floor
Coral Gables, Florida 33134
Phone: (305) 476-7400
Fax: (305) 476-7444

TO: DAVIS POLK & WARDWELL

James L. Kerr, Esq.
450 Lexington Avenue
New York, New York 10017
*Attorneys for Respondent/
Interpleader Petitioner*
CITIBANK, N.A.

WHITE & CASE LLP

Glenn Kurtz, Esq.
1155 Ave of the Americas
New York, NY 10036
Attorneys for Interpleader Respondent
SHANGHAI PUDONG DEVELOPMENT BANK CO., LTD.